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February 21, 2023

VIA ECF & E-MAIL

The Honorable Justice Cathy Seibel United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601

Wheel Choice, LLC v. Sainty Group et al. Case No. 7:20-CV-05629 (CS)

Dear Justice Seibel:

As the court is aware, I represent plaintiff Wheel Choice, LLC ("Wheel Choice"), in the above-referenced action. I write on behalf of plaintiff Wheel Choice and defendant Jiangsu Sainty Machinery and Imp. & Exp. Co. Ltd. ("Jiangsu").

The parties are pleased to report to the Court that a settlement agreement in principal has been reached in the above-referenced action. To that end, the parties have begun memorializing the settlement agreement to writing. Notwithstanding such however, it may take a few weeks to finalize, execute and implement a fully integrated settlement agreement. As such, the parties respectfully request that the Court extend the stay of discovery due to expire on February 24, 2023, until and including April 14, 2023. Such extension should provide sufficient time for the parties to finalize and execute the settlement agreement.

The parties thank the Court in advance for any courtesy extended in this regard.

Respectfully submitted,

Jeremy Rosenberg (JR-4111)

cc: Kenneth Katz, Esq.

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